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January 7, 2025

Via ECF

Honorable Tonianne J. Bongiovanni, U.S.M.J.
US District Court of New Jersey
Clarkson S. Fisher Building
402 East State Street, Courtroom 6 East
Trenton, NJ 08608

Re: Toskova v Princeton University
Civil Action No.: 3:24-cv-06724-RK-TJB

Dear Judge Bongiovanni:

This firm represents Defendant, The Trustees at Princeton University d/b/a Princeton University (improperly pled as The Trustees at Princeton University a/k/a Princeton University, Princeton University Department of Public Safety, Princeton University Athletics Department, Princeton University Campus Recreation Department) ("Princeton University" or "Defendant"), in the above-captioned matter. The parties submit this joint status update in accordance with the Court's Text Minute Entry entered on November 13, 2024.

This matter involves a claim by plaintiff alleging personal injury allegedly suffered while participating in an intercollegiate tennis match on the campus of Princeton University. On December 11, 2024, Defendant, Princeton University received plaintiff's answers to Interrogatories which included HIPAA authorizations. Defendant, Princeton University is in the process of requesting plaintiff's full medical records. On December 12, 2024, Princeton University requested a more specific answer regarding plaintiff's photos and video which has not yet been responded to. Plaintiff also owes a response to Princeton University's request for documents.

Princeton University is in the process of finalizing its responses to Plaintiff's Interrogatories and Plaintiff's Request for Production, which we anticipate will be served by January 23, 2025.



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Once written discovery has been exchanged, the parties anticipate they will be in a position to conduct fact depositions within the next sixty to ninety days. Defendant, Princeton Tennis Program was dismissed without prejudice on November 27, 2024. Additionally, the parties respectfully request your Honor schedule a follow-up conference call, preferably, in ninety days.

Respectfully yours,

/s/ Yvette L. Donaldson
Yvette L. Donaldson, Esq.

cc: All Counsel of Record (via ECF)

The Court shall conduct a telephone conference on 4/8/2025 at 10:30 a.m. The parties are directed to confer, coordinate, and initiate the joint conference call. Once initiated, the parties shall conference in the Court by calling 609-989-2040.

It is on this 10th day of January, 2025,
SO ORDERED.

s/Tonianne J. Bongiovanni
Hon. Tonianne J. Bongiovanni, U.S.M.J.